

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA

Plaintiff,

CASE NO.: 00 6032 CR ZLOCH

vs.

Florida Bar No.: 198242

LIONEL J. HANNA


Defendant.

DEFENDANT'S PROPOSED VOIR DIRE

Pursuant to Fed. R. Crim. Proc. 24 (a) the Defendant respectfully requests that the following voir dire questions be asked during jury selection, in addition to the standard questions asked by this Court in criminal trials.

Respectfully submitted,  
Don S. Cohn, Esq.  
Attorney for Defendant

By:

  
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NON-COMPLIANCE OF S.D. Fla. L.R. 5.1A1

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**Plaintiff,**

**vs.**

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**Defendant.**

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**DEFENDANT'S PROPOSED VOIR DIRE QUESTIONS**

1. Would the fact Mr. Hanna chooses not to testify in this case mean anything to you in your deliberation as to guilt or innocence?
2. Assuming you found the government had failed to prove its case beyond a reasonable doubt, applying the instructions given you by Judge Zloch, would you be able to find Mr. Hanna not guilty even though he did not testify?
3. Do each of you understand the Court's instructions on the law are the only instructions you are able to apply in making a decision in this case as to the facts?
4. Does everyone here understand Judge Zloch will instruct you as to the elements of the crimes with which Mr. Hanna is charged and that before you are able to return a guilty verdict you must find the evidence shows beyond a reasonable doubt that each and every one of the elements required, as instructed to you by Judge Zloch, exists?
5. Is there anyone here who would vote guilty, even if there is no proof beyond a reasonable doubt as to all the elements of the crimes charged, merely because of the type of evidence produced?

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed on the 17th day of August 2000 to Donald F. Chase, II, Assistant United States Attorney, 500 East Broward Boulevard, Suite 700, Fort Lauderdale FL 33394.

A handwritten signature in black ink, appearing to read 'Don S. Cohn', written over a horizontal line.

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